

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Jessica Prendergast, a Special Agent with the Federal Bureau of Investigation (FBI), Philadelphia Division, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent with the Federal Bureau of Investigation (FBI) since January 2021. I am currently assigned to the FBI's Philadelphia Division, Newtown Square Resident Agency. As such, I am tasked with investigating violent crimes and gangs, including commercial robberies and burglaries and other violations of the Hobbs Act, carjackings, interstate transportation of stolen property, and other violations of federal law to include violent crimes against children involving child sex abuse material ("CSAM"). Prior to being assigned to the Violent Crimes Task Force, I was assigned to the Safe Streets Task Force on two different gang squads in the Chicago Division of the FBI.

2. This affidavit is made in support of a criminal complaint charging ANIRUTH KUPPUSAMY ("KUPPUSAMY") with violating Title 18, United States Code, § 2251(a).

3. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

4. The statements in this Affidavit are based on my investigation and other law enforcement officers' investigation of this matter. Because this Affidavit is being submitted for the limited purpose of demonstrating probable cause in support of the attached criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause for the arrest of KUPPUSAMY. Unless specifically indicated, all conversations and statements described in this Affidavit are related in substance and in part. Where I assert that an event took place on a particular

date or at a particular time, I am asserting that it took place on or about the date or at or near the time asserted.

BACKGROUND OF THE INVESTIGATION

7. On March 8, 2025, in coordination with FBI Special Agents assigned to the Atlanta Division, Special Agents of the Philadelphia Division of the FBI began reviewing information obtained from an emergency disclosure request from Meta Platforms Inc. The response included conversation between Instagram users totallykindday, [Victim 1 account], [Victim 1 account2], and others. As described below, the FBI identified the user of totallykindday as KUPPUSAMY and the user of [Victim 1 account 1 and Victim 1 account 2] as a minor female, [V1].¹ The FBI identified [V1] as a minor female born in January of 2008 who resides in Georgia.

8. KUPPUSAMY is a 25-year-old male who resides in the Eastern District of Pennsylvania. Records received from Meta revealed that the user totallykindday provided a birthdate that matches KUPPUSAMY's birthday and accessed the totallykindday account from IP addresses resolving to Frazer, Pennsylvania in February and March of 2025. Frazer is a neighborhood within Chester County, Pennsylvania, within the Eastern District of Pennsylvania.

11. On or about February 11, 2025, KUPPUSAMY, using his Instagram account, requested [V1] produce and send him CSAM as set forth below:

totallykindday: lemme see sum chop chop
dont need to be elaborate pull your pants down

[Victim account1]: mmm haven't shaved but i'll do anything for u

totallykindday: you think i care about that i might not even let you shave when

¹[V1's] full name is known to law enforcement but is not set forth in full herein because she is a minor. I have confirmed [V1's] full identity with Agents from the Atlanta Division of the FBI who have encountered [V1] in prior investigations.

you at mine

Victim account 1: [liked an image]

[sent video file 617124297573376 of a white female naked from the waist down. She then touches her vagina before directing the camera up to her chest where she lifts her shirt and bares her breasts]
video for u

totallykindday: amazing
question
what u smell likw

Victim account 1: mmmnmnmn vanilla perfume and coconut oil

totallykindday: no hoe ur pussy
ur scent
coconut oil is nice tho

12. I have reviewed the video described in the preceding paragraph. Based on my training and experience, I believe that the images of **V1's** genitals contained in that video constitute child pornography under Title 18, United States Code, Section 2256(8), as it is a visual depiction of sexually explicit conduct where the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, which includes a lascivious exhibition of the genitals or pubic area of any person. In addition, based on my training and experience, I know that Instagram is an online social media provider operated over the Internet.

13. I have reviewed other messages sent on Instagram by KUPPUSAMY in which he admits that he knows that **V1** is under the age of 18 and appears to be aware of her birthday. For example, on February 22, 2025, KUPPUSAMY sends a message to **V1** stating, "if i get job far away i can just kidnap u right need to spirit u away and hold u hostage then elope when ur 18". Likewise, on December 4, 2024, KUPPUSAMY acknowledges that **V1** is a minor and appears be aware of her upcoming 17th birthday in January:

totallykindday: i need to come before ur bday
ill never get 16yo v1 back after that...

16. Based on the information above, I respectfully submit that there is probable cause to believe that KUPPUSAMY committed violations of Title 18, United States Code, Section 2251(a) sexual exploitation of children known colloquially as production of child pornography, on or about February 11, 2025. Therefore, I respectfully request that a criminal complaint and arrest warrant be issued for the KUPPUSAMY.

/s/ Jessica Prendergast
Jessica Prendergast
Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone this day of March, 2025.

Lynne A. Sitarski
Digitally signed by
Lynne A. Sitarski
Date: 2025.03.09
18:37:26 -04'00'

HONORABLE LYNNE A. SITARSKI
United States Magistrate Judge